

**ENFORCEMENT RESPONSE REPORT**  
**FOR**  
**WESTBANK ASBESTOS**  
**JEFFERSON PARISH, LOUISIANA**

Prepared for

**U.S. Environmental Protection Agency Region 6**  
1445 Ross Avenue  
Dallas, Texas 75202

Contract No. 68-W-01-005  
Work Assignment No. 06-01-03-0018  
Document Control No. 12632.2001.0264  
WESTON Work Order No. 12632.001.083.1550.01

Submitted by

**Tetra Tech EM Inc.**  
11955 Lakeland Park Blvd., Suite 100  
Baton Rouge, Louisiana 70809  
(225) 753-4949

For

**Roy F. Weston, Inc.**  
5599 San Felipe, Suite 700  
Houston, Texas 77056  
(713) 985-6600

September 28, 2001

## **1. INTRODUCTION**

On August 15, 2001, the U.S. Environmental Protection Agency (EPA) Region 6 Superfund Technical Assistance and Response Team (START-2) was tasked by the EPA Response and Prevention Branch (RPB) under Technical Direction Document No. 06-01-08-0011 to conduct enforcement response activities at the Westbank Asbestos site in Jefferson Parish, Louisiana. START-2 was directed (1) to locate and review files from state and local authorities, federal agencies, and interested parties; (2) to provide enforcement support activities for the U.S. Department of Justice effort; and (3) to investigate the availability of the State of Louisiana report that summarizes the composition of asbestos-containing material located at the Westbank Asbestos site.

## **2. BACKGROUND INFORMATION**

The Westbank Asbestos site is located on the west bank of the Mississippi River near New Orleans, Louisiana, and occupies area in the Jefferson, Orleans, and Plaquemine parishes. Asbestos-containing material was identified in residential yards, schools, day cares, and other community areas. The majority of the asbestos-containing material was located in driveways, walkways, right-of-ways, and play areas. The asbestos-containing material was reported to have originated from the Johns-Manville plant that operated from 1929 to 1975 in Marrero, Louisiana. The plant produced asbestos-containing products in which a by-product was generated that consisted of an asbestos-containing waste aggregate. It was reported that the aggregate was pulverized in a hammer mill and mixed with a filler to form a stable roadbed-like material. The asbestos-containing aggregate was then used by local residents for construction of driveways, walkways, and addition external areas. No records are available detailing the quantity and the time period in which the asbestos-containing aggregate material was distributed to the public.

EPA conducted a large scale removal action at the Westbank Asbestos site from October 1996 until July 1998. Asbestos-containing material was identified and removed from 1,348 properties. EPA conducted another removal action at 26 properties from November 9 through December 12, 1998.

On December 7, 1999, the EPA conducted a final removal action at six properties, completing activities on December 28, 1999.

### **3. ACTIONS TAKEN**

On September 5, 2001, START-2 member Jeff Wright conducted a file search at the Louisiana Department of Environmental Quality (LDEQ) capital regional office in Baton Rouge, Louisiana. START-2 reviewed all Westbank Asbestos site documents that were archived and stored on the LDEQ inactive and abandoned sites database.

During the file search, Mr. Wright was able to obtain documents indicating that LDEQ personnel collected two bulk asbestos samples on December 4, 1995. The samples were submitted to the LDEQ Microanalytical Laboratory in Baton Rouge, Louisiana, for asbestos composition analysis. LDEQ representative Debra Bendily submitted a site visit summary report on December 5, 1995 that described field activities conducted on December 4, 1995; however, the report did not mention sample collection, location, or results of the analysis. All documents relating to the December 4, 1995 site visit are submitted as Appendix A of this report. No other activities were conducted in association with this TDD.

### **4. APPENDICES**

All documentation associated with this project is provided in the following appendices:

Appendix A LDEQ Archive Documents (5 pages)

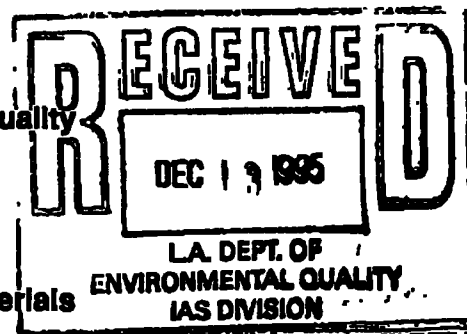
Appendix B Technical Direction Document No. 06-01-08-0011

## **APPENDICES**

**APPENDIX A**  
**LDEQ ARCHIVE DOCUMENTS**  
**(5 pages)**

Louisiana Department of Environmental Quality  
Microanalytical Laboratory  
11720 Airline Highway  
Baton Rouge, LA 70817

Report Of Asbestos Analysis On Bulk Materials  
December 13, 1995



Debra Bendily  
IAS Division  
Central Office

LOG # 12-13-95 #99

Dear Debra:

The following is a report of the results obtained from the analysis of the bulk asbestos sample submitted to our laboratory on 12/08/95.

Inspector Log No.: A16120495001

Analyst: Steven Lafleur

Color of sample: grey

Homogeneity: yes

Comments:

Method of preparation: Standard according to EPA's "Method for the Determination of Asbestos in Bulk Building Materials" - EPA-600/R-93/116.

Lab Sample ID No.: A95-0285

Date Analysis Began: 12/12/95

Texture: coarse, cement-like

No. of layers if not homogeneous:

Method of analysis: Stereomicroscopic examination and polarized light microscopic examination according to EPA-600/R-93/116.

Asbestos Present? Yes

Fibrous-Nonasbestos Component Present: ? none detected (<1%)

Number of Distinct Fibrous Components: Two

Types of Fibers Present and Estimated Range (% Area) of Each Fiber Type: 5% Crocidolite, 4% Chrysotile.

Description of Nonfibrous Component: Dolomite 91%.

**NOTE:** This report relates solely to the item tested.

This report shall not be used in any way to claim product endorsement by NVLAP, any agency of the U. S. Government, nor any agency of the State of Louisiana.

If there are any questions concerning this report, or if additional information is needed, please contact the undersigned at telephone number (504) 295-8907.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Lafleur".

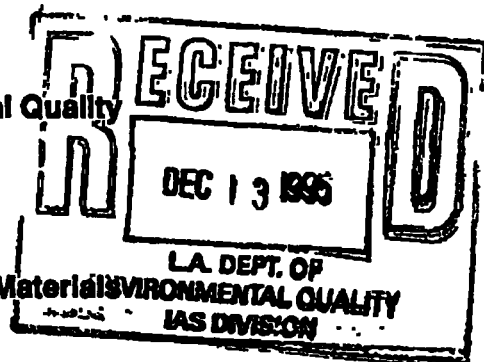
Steven Lafleur  
Microanalytical Chemist

**SAMPLE DATA SHEET  
DEQ AIR MICROANALYTICAL LABORATORY**

<b>SAMPLE SOURCE/LOCATION:</b> # 1		<b>TIME/DATE TAKEN:</b> 12-04-95 . 1125	
<b>COLLECTED BY:</b> <u>DEPTA BENDLEY</u> <b>SIGNATURE:</b> <u>[Signature]</u> <b>INSPECTOR'S LOG #:</b> <u>A 16 0120495001</u>		<b>WIND SPEED/DIRECTION:</b> NA	
<b>COMPLAINANT NAME/ADDRESS/PHONE:</b> NA		<b>POSSIBLE SOURCE:</b>	
<b>ANALYZE FOR:</b> ASBESTOS			
<b>COMMENTS, OTHER INFORMATION:</b>			
<b>LAB LOG #:</b>			
<b>REQUESTED PRIORITY:</b> (circle one)		<b>PRIORITY JUSTIFICATION:</b>	
HIGH LOW <u>REGULAR</u> COURTESY			
<b>RESULTS:</b>			
<b>SPLIT SAMPLES ACCEPTED:</b> YES _____ NO <u>X</u>			
<b>NAME:</b> _____			
<b>SIGNATURE:</b> _____			
* USE ONE DATA SHEET & EVIDENCE ENVELOPE FOR EACH INDIVIDUAL SAMPLE * KEEP COPY OF FORM FOR YOUR FILES * BE SURE TO SIGN CHAIN OF CUSTODY ON ENVELOPE			
AAC-9 (6/94)			
WHITE-LAB	YELLOW-FILE	PINK-INSPECTOR	GOLD=RECEIPT

Louisiana Department of Environmental Quality  
Microanalytical Laboratory  
11720 Airline Highway  
Baton Rouge, LA 70817

Report Of Asbestos Analysis On Bulk Materials  
December 13, 1995



Debra Bendly  
IAS Division  
Central Office

LOG # 12-13-95 # 99

Dear Debra:

The following is a report of the results obtained from the analysis of the bulk asbestos sample submitted to our laboratory on 12/08/95.

Inspector Log No.: A16120495002

Analyst: Steven Lafleur

Color of sample: grey

Homogeneity: yes

Comments:

Method of preparation: Standard according to EPA's "Method for the Determination of Asbestos in Bulk Building Materials" - EPA-600/R-93/116.

Lab Sample ID No.: A95-0286

Date Analysis Began: 12/12/95

Texture: chalky

No. of layers if not homogeneous:

Method of analysis: Stereomicroscopic examination and polarized light microscopic examination according to EPA-600/R-93/116.

Asbestos Present? Yes

Fibrous-Nonasbestos Component Present: ? none detected (<1%)

Number of Distinct Fibrous Components: One

Types of Fibers Present and Estimated Range (% Area) of Each Fiber Type: 9% Chrysotile.

Description of Nonfibrous Component: 30% Calcite, 51% Gypsum.

**NOTE:** This report relates solely to the item tested.

This report shall not be used in any way to claim product endorsement by NVLAP, any agency of the U. S. Government, nor any agency of the State of Louisiana.

If there are any questions concerning this report, or if additional information is needed, please contact the undersigned at telephone number (504) 295-8907.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Lafleur".

Steven Lafleur  
Microanalytical Chemist



**SAMPLE DATA SHEET**  
**DEQ AIR MICROANALYTICAL LABORATORY**

<b>SAMPLE SOURCE/LOCATION:</b> t' 2		<b>TIME/DATE TAKEN:</b> 1325 12.04.95	
<b>COLLECTED BY:</b> <u>Debra A. Bendryk</u> <b>SIGNATURE:</b> <u>[Signature]</u> <b>INSPECTOR'S LOG #:</b> <u>A16 120495002</u>		<b>WIND SPEED/DIRECTION:</b>  NA	
<b>COMPLAINANT NAME/ADDRESS/PHONE:</b>  NA		<b>POSSIBLE SOURCE:</b>	
<b>ANALYZE FOR:</b> ASBESTOS			
<b>COMMENTS, OTHER INFORMATION:</b>			
<b>LAB LOG #:</b>			
<b>REQUESTED PRIORITY:</b> (circle one)		<b>PRIORITY JUSTIFICATION:</b>	
HIGH LOW <u>REGULAR</u> COURTESY			
<b>RESULTS:</b>			
<b>SPLIT SAMPLES ACCEPTED:</b> YES _____ NO <u>X</u>			
<b>NAME:</b> _____			
<b>SIGNATURE:</b> _____			
<b>* USE ONE DATA SHEET &amp; EVIDENCE ENVELOPE FOR EACH INDIVIDUAL SAMPLE</b>			
<b>* KEEP COPY OF FORM FOR YOUR FILES</b>			
<b>* BE SURE TO SIGN CHAIN OF CUSTODY ON ENVELOPE</b>			
AAC-9 (6/94)			
<b>WHITE-LAB      YELLOW-FILE      PINK-INSPECTOR      GOLD=RECEIPT</b>			



# State of Louisiana

## Department of Environmental Quality



Edwin W. Edwards  
Governor

December 5, 1995

William A. Kucharski  
Secretary

To: Westbank Asbestos File  
From: Debra Bendily, Assessment Coordinator  
Re: Site Visit and Information Update

On Monday, December 4, 1995, this inspector accompanied Mr. Troy Naquin of E&E contractors for EPA's Emergency Response Division and Mr. John Sharp of the Southeast Region for the LDEQ-Air Quality Division to the Westbank Asbestos site. The former Johns-Manville facility area, the levee disposal area, and some of the affected residential areas were visited.

The facility area appears to have been renovated and is now occupied by Arrow International Export Packers and a chlorinated liquid (i.e. chlorox) manufacturer. The local Johns-Manville representative, a Mr. Tauzin, has relocated his office. John Sharp plans to contact him for information on site status. Roofing tile debris and cementitious fibrous material was seen in the servitude and public access areas along the ditches and roadway surrounding the former plant site.

The levee disposal area is located at levee marker 4050 and extends along the span of the former facility's frontage on the river. Asbestos-Containing-Material (ACM) warning signs are periodically posted. The fencing along one section was destroyed by a barge accident and has not been repaired. According to Mr. Oliver Morgan, a levee resident of over 40 years, Johns-Mansfield dumped tailings the entire length of the levee from the crossover bridge up to his home. This includes several hundred feet more than was fenced off.

Multiple residential areas were scanned for evidence of fibrous cementitious material. The material was typically located in servitudes and/or driveways and/or drainage areas. An area behind some newer homes in Marrero, as well as some previously sampled residences showed the presence of similar material.

Mr. John Martin, the EPA OSC, plans to meet with departmental staff during the next week, and visit the site area soon. He proposes to assess the need for response to residential area contamination as a separate case from the response to any facility site and landfill areas contamination. Only the response to the residential area is currently being evaluated.

**APPENDIX B**

**TECHNICAL DIRECTION DOCUMENT No. 06-01-08-0011**

**(1 page)**

**START2**  
**Technical Direction Document**  
 U.S. EPA Region 6  
 1445 Ross Avenue, Suite 1200  
 Dallas, Texas 75202-2733

Roy F. Weston

TDD: 06-01-08-0011  
 Contract: 68-W-01-005

TDD - Signed by Henry Thompson/R6/USEPA/US on 08/15/2001 01:56:28 PM, according to /R6/USEPA/US

Purpose: Work Assignment Initiation

Period: Base Period

Start Date: 08/15/2001

Completion Date: 09/30/2001

Project/Site Name: Westbank Asbestos  
 County: Jefferson Parish  
 City, State Zip: , LA  
 SSID: Y6 CERCLIS: LAD985170711

WorkArea: RESPONSE ACTIVITIES  
 Activity: Enforcement Response  
 Section of SOW: II.B.9  
 Performance Based: No

Authorized TDD Ceiling:	Cost/Fee	LOE
Previous Action(s):	\$0.00	0.0
This Action:	\$2,631.20	(b) (4)
New Total:	\$2,631.20	

**Specific Elements****Description of Work:**

This TDD is under Work Assignment 0084

**Specific Element(s):** - Locate and review files of state and local authorities, other federal agencies, and interested parties by 08/30/2001.

**Comments:** 1. Provide Enforcement support activities in support of DOJ effort.  
 2. Attempt to find the state report that summarizes the ACM's composition.

Standard Language: Coordinate with Task Monitor: John Martin 214.665.6748

**Accounting and Appropriation Information**

SFO:

Line	CON	TRMS	Budget FY	Appropriation Code	Budget Org	Program Element	Object Class	Site Project	Cost Org	Amount
1	SCR001	AAA	01	T	6ASOP	50102D	2505	06 Y60000	C001	\$2,631.20

Funding Summary	Funding
Previous:	\$0.00
This Action:	\$2,631.20
Total:	\$2,631.20

**Funding Category**  
 CERCLA Pipeline

**Task Monitor Section**

Task Monitor: John Martin

Date: 08/15/2001

Project Officer Section - Signed by Henry Thompson/R6/USEPA/US on 08/15/2001 01:56:28 PM, according to /R

Project Officer: Henry Thompson

Date: 08/15/2001

Contracting Officer Section - Signed by Henry Thompson/R6/USEPA/US on 08/15/2001 01:56:28 PM, according

Contracting Officer:

Date: 8.15.01

Contractor Section